

# Exhibit B

**PROPOSED MODIFICATIONS TO *HECKMAN* PLAINTIFFS' PROPOSED  
PROTECTIVE ORDER AMENDMENT**

The following shall be included as Paragraph 7(j) of the Amended Protective Order:

- j. counsel for Plaintiffs in *Heckman v. Live Nation Entertainment, Inc. et al.* Case No. 2:22-cv-00047-GW-GJS (the “*Heckman* Plaintiffs”), including any attorneys, paralegals, other professional personnel (including support and IT staff), and agents or independent contractors retained by the *Heckman* Plaintiffs to assist in the *Heckman* action whose functions require access to the information, ***who have acknowledged and agreed, in writing, to be bound by this Order, including its prohibition on disclosure of Confidential material to any person other than as set forth in this Paragraph 7; provided, for the avoidance of doubt, that disclosure of Confidential material by Defendants under this subparagraph neither renders Defendants “producing persons” of such material for purposes of this Paragraph 7 nor permits Defendants to disclose such material to any recipient other than as set forth in this Paragraph 7.***

The following shall be included as Paragraph 8(k) of the Amended Protective Order:

- k. counsel for Plaintiffs in *Heckman v. Live Nation Entertainment, Inc. et al.* Case No. 2:22-cv-00047-GW-GJS (the “*Heckman* Plaintiffs”), including any attorneys, paralegals, other professional personnel (including support and IT staff), and agents or independent contractors retained by the *Heckman* Plaintiffs to assist in the *Heckman* action whose functions require access to the information, ***who have acknowledged and agreed, in writing, to be bound by this Order, including its prohibition on disclosure of Highly Confidential material to any person other than as set forth in this Paragraph 8; provided, for the avoidance of doubt, that disclosure of Highly Confidential material by***

*Defendants under this subparagraph neither renders Defendants “producing persons” of such material for purposes of this Paragraph 8 nor permits Defendants to disclose such material to any recipient other than as set forth in this Paragraph 8.*